

# **EXHIBIT CC**

**From:** [Arjun Vasani](#)  
**To:** [Keech, Ryan O.](#); [Chiu, Stacey G.](#); [Makitalo, Rebecca I.](#); [Winningham, Jacob R.](#)  
**Subject:** Arjun Vasani v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx - Informal Discovery Conference Request  
**Date:** Thursday, October 23, 2025 11:10:14 AM

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Counsel,

I write to request an informal discovery conference with Judge Alka Sagar, who has been assigned as the new Magistrate Judge.

Pursuant to Judge Sagar's Civil Procedures, "The purpose of an Informal Discovery Conference is to resolve a discovery dispute that can be addressed by the Court after reviewing each party's brief, succinct position on the nature of the dispute, and the relief that they are seeking".

I am seeking:

1. An agreement to mutually record meet-and-confers, due to Checkmate's misconduct and misrepresentations of prior meet-and-confers.
2. Guidance on phasing and discovery limitations, as per Judge Frimpong's scheduling order, which Checkmate has disregarded.
3. Responses to Requests for Admission compliant with Judge Sagars directive: "**Parties** responding to interrogatories or document requests shall not use boilerplate objections that violate Federal Rules of Civil Procedure 33(b)(4) or 34(b)(2)."

Please confirm that you are amenable, as the Court finds this process "useful and efficient to address a discrete dispute, scheduling issues, or recalcitrant misconduct in discovery".

Best regards,  
Arjun Vasani

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**Subject:** Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx  
**Date:** Friday, October 24, 2025 12:20:56 PM  
**Attachments:** [2025-09-16 Checkmate's Responses to Vasan's Second Set of RFAs.pdf](#)  
[2025-09-15 Checkmate's Responses to Vasan's First Set of RFAs.pdf](#)  
[\[DRAFT\] Joint Stipulation - Insufficient Responses to Requests for Admission.docx](#)  
[\[2025-10-10\] Checkmate's Responses to Vasan's Third Set of RFAs.pdf](#)  
[meet-and-confer-set-1.pdf](#)  
[rfa-set-1-lunchbox-emails.pdf](#)  
[meet-and-confer-set-2.pdf](#)  
[rfa-set-2-separation.pdf](#)  
[rfa-set-3-byod-dispute.pdf](#)

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Counsel,

Attached please find Plaintiff's portions of the L.R. 37 Joint Stipulation regarding the sufficiency of Checkmate's RFA responses (Sets One–Three). This joint stip tracks Judge Sagar's procedures and L.R. 37.

In the spirit of narrowing disputes, I've grouped RFAs with identical defects and identified a small subset for deeming admitted (objective MIME/filename/URL/body-term items) while proposing that the remainder be cured by Rule-compliant amended answers describing the "reasonable inquiry" required by FRCP 36(a)(4).

Please return your "Opposing Party's Contentions" sections (or proposed amended answers obviating the issue) within 7 days. If I do not receive your portions by then, I will file my motion supported by a declaration attaching this draft and my L.R. 37-1 correspondence. I've attached the word version as well as proposed attachments from my end.

I remain available to meet and confer at your convenience this upcoming week, only on this issue, either in Cerritos, California or remotely.

Regards,  
Arjun Vasan, Plaintiff in Pro Per  
(562) 900-6541 | [arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)